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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 LINDA SAVOY,)
9 Plaintiff,)
10 vs.)
11 DIVERSIFIED CONSULTANTS, INC.,)
12 a foreign corporation,)
13 Defendant.)
14

No. 2:13-cv-01428-APG-VCF

LAW OFFICES
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15 **OPPOSITION TO VERIFIED PETITION FOR PERMISSION TO PRACTICE
IN THIS CASE ONLY BY ATTORNEY NOT ADMITTED TO THE BAR
OF THIS COURT AND REQUEST FOR HEARING**

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17 On October 8, 2013 Steven R. Dunn filed his verified
18 Petition to appear in this matter pro hac vice (Exhibit 1).
19 Plaintiff opposes approval of the Petition. Counsel for
20 Plaintiff has practiced before this Court for over twenty years
21 and has never previously opposed any such Petition. Oral
22 argument is requested.

23 Attached as Exhibit 2 is Anchondo v. Anderson, Crenshaw &
24 Associates, LLC, 2011 WL 4549279 (D.New Mexico 2011).
25 Magistrate Judge Lynch determined "[t]here is clear and
26 convincing evidence that Backal and Dunn acted in bad faith
27 attempting to deceive both Anchondo and the Court about whether
28 ACA had insurance coverage when this lawsuit was filed and in

1 failing to submit the claim to National Union (Id., 5). In
2 making this determination, the Court sanctioned Mr. Dunn in
3 excess of \$69,000 (Id., 6). On February 19, 2013 the Tenth
4 Circuit affirmed the District Court's scathing decision
5 (Exhibit 3).

6 Attached as Exhibit 4 are the Courtroom Minutes and Order
7 from *Branstetter v. National Credit Adjusters*, a FDCPA case now
8 pending in the United State District Court for the District of
9 Colorado. This Honorable Court will note that Mr. Dunn
10 represents Defendant in that matter and that production of the
11 underlying insurance policy was indeed the subject of a Motion
12 to Compel and threat of further sanctions. The production of
13 such an insurance policy is a mandatory disclosure under FRCP
14 26 (a) (1) (A) (iv).
15

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16 Respectfully submitted
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